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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JULIE GOODWIN, an individual,

12 Plaintiff,

13 v.

14 MATHEW JOHN, an individual; VALLEY
15 INN MOTEL; MVJ CAR WASH &
16 LAUNDROMAT; MV JOHN
17 CORPORATION, a Nevada corporation
18 and Does 1-10, inclusive,

19 Defendants.

Case No: 2:19-cv-01642-EJY

**STIPULATION AND
PROPOSED ORDER TO
EXTEND DEADLINE TO
FILE OPPOSITION TO
PLAINTIFF'S MOTION
FOR AN ORDER TO
SHOW CAUSE**

(First Request)

20 COME NOW, Defendants, MATHEW JOHN and MV JOHN CORPORATION, by
21 and through their counsel of record, ADAM K. ANDERSON, ESQ. of BARNEY,
22 McKENNA & OLMSTEAD, PC, and Plaintiff, JULIE GOODWIN, by and through her
23 counsel of record, ROYI MOAS, ESQ. of WOLF, RIFKIN, SHAPIRO, SCHULMAN &
24 RABKIN, LLP, and hereby stipulate to extend the deadline to file a response to Plaintiff's
25 Motion for Order to Show Cause filed on November 11, 2022 (ECF No. 156) (hereafter
26 the "Motion"). This is the first stipulation for an extension of filing a response to said
27 Motion.

28 Presently, a response to the Motion is due by December 6, 2022. The Parties hereby
request an additional 14 days, up to and including Tuesday, December 20, 2022, to file a
response. The extension is needed as Defendants have recently retained Adam K.
Anderson, Esq. with the Law Offices of Barney McKenna & Olmstead, P.C. to represent

1 them in this case. Defendants' counsel is working with Defendants to provide the
2 Ordered documents (ECF No. 154). Excess time is requested to also allow Defendants'
3 new counsel sufficient time to review the pleadings and details in this case.

4 DATED this 6th day of December, 2022.

5 BARNEY, McKENNA & OLMSTEAD, P.C.

6 By: /s/ Adam K. Anderson

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11 DATED this 6th day of December, 2022.

12 WOLF, RIFKIN, SHAPIRO, SCHULMAN &
13 RABKIN, LLP

14 By: /s/ Royi Moas

15 ROYI MOAS, ESQ. (SBN 10686)
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Attorneys for Plaintiff

20 **ORDER**

21 The Parties' request to extend the deadline to submit a response to Plaintiff's Motion for
22 Order to Show Cause (ECF No. 156) from December 6, 2022 to December 20, 2022, is hereby
23 GRANTED.

24 IT IS SO ORDERED.

25 
26 UNITED STATES MAGISTRATE JUDGE
27

28 DATED: December 6, 2022